



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

OFFICE OF  
ENVIRONMENTAL CLEANUP

November 1, 2017

Mr. Bob Wyatt  
NW Natural  
220 NW 2nd Avenue  
Portland, Oregon 97209

*sent via email only*

Mr. Myron Burr  
Siltronic Corporation  
7200 NW Front Avenue, M/S 20  
Portland, Oregon 97210-3676

Re: EPA comments on Pre-Remedial Basis of Design Technical Evaluations Work Plan, Gasco Sediments Cleanup Action

Dear Sirs:

The U.S. Environmental Protection Agency (EPA) and NW Natural met on October 31, 2017 for a preliminary discussion regarding comments on the Pre-Remedial Basis of Design Technical Evaluations Work Plan (Work Plan) provided by EPA to NW Natural and Siltronic Corporation on October 18, 2017. The discussion included three comments that NW Natural feels prevents them from moving forward outside of the dispute resolution process articulated in Section XVI. of the 2009 Administrative Settlement Order on Consent for Removal Action (CERCLA Docket No. 10-2009-0255). Clarification was also provided by EPA on several other comments that will, along with the full comment set, be further discussed soon with a larger audience if the formal dispute process can be avoided now. Based on the October 31 discussion, EPA has decided to retract the three comments requested by NW Natural; specifically, general comment 2 and specific comment 34 which deal with Final Project area definition and those portions of specific comment 36 that deal with Oregon state hot spots of contamination. NW Natural's ability to invoke dispute on the remaining Work Plan comments will start after submittal of EPA's comments on the basis of design technical memorandum that a particular Work Plan comment applies to.

Please let me know if you have any questions or concerns at (206) 553-1220 or via email at [sheldrake.sean@epa.gov](mailto:sheldrake.sean@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Sean Sheldrake".

Sean Sheldrake, RPM

Cc: Dana Bayuk, DEQ  
Lance Peterson, CDM  
TCT

*via email only*